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Acting under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-577 CRB
)	
Plaintiff,)	SEPTEMBER 29, 2023 DECLARATION OF AUSA
)	ROBERT S. LEACH IN SUPPORT OF UNITED
v.)	STATES' MOTION FOR FOREIGN DEPOSITIONS
)	UNDER RULE 15 OF THE FEDERAL RULES OF
MICHAEL RICHARD LYNCH, and)	CRIMINAL PROCEDURE
STEPHEN KEITH CHAMBERLAIN,)	
)	Date: November 1, 2023
Defendants.)	Time: 1:30 p.m.
)	Court: Hon. Charles R. Breyer
)	Courtroom 6, 17th Floor

I, Robert S. Leach, declare as follows:

- I am an Assistant United States Attorney representing the United States of America, the plaintiff in this case.
- I understand Marc Geall is represented by Swanson & McNamara LLP. To date, counsel for Mr. Geall has not agreed to accept service of a subpoena. From my discussions with

counsel, I understand Mr. Geall resides in or near London and would not contest being deposed in London.

3. Attached as Exhibit A is a true and correct copy of Trial Exhibit 766 from the case *United States v. Sushovan Hussain*, CR 16-462-CRB.
4. The government attempted to make contact with David Toms through his prior counsel in the *Hussain* case. We recently were advised to contact Mr. Toms at his new employer. Based on communication with his new employer and Mr. Toms, the government understands Mr. Toms is in the process of possibly retaining new counsel. Mr. Toms has yet to indicate whether he will agree to accept service of a subpoena.
5. Attached as Exhibit B is a true and correct copy of a witness statement by Fernando Lucini dated September 14, 2018, in a parallel civil case in the United Kingdom against Dr. Lynch raising similar allegations.
6. Attached as Exhibit C is a true and correct copy of a witness statement by Fernando Lucini dated November 16, 2018, in a parallel civil case in the United Kingdom against Dr. Lynch raising similar allegations.
7. Attached as Exhibit D is a true and correct copy of a witness statement by Fernando Lucini dated February 8, 2019, in a parallel civil case in the United Kingdom against Dr. Lynch raising similar allegations.
8. Lucini is represented by Swanson & McNamara LLP. To date, counsel for Lucini has not agreed to accept service of a subpoena. The government understands Lucini resides in or near Cambridge.
9. Attached as Exhibit E is a true and correct copy of a witness statement by Christopher Goodfellow dated September 14, 2018, in a parallel civil case in the United Kingdom against Dr. Lynch raising similar allegations.
10. Attached as Exhibit F is a true and correct copy of a witness statement by Christopher Goodfellow dated November 17, 2018, in a parallel civil case in the United Kingdom against Dr. Lynch raising similar allegations.

11. Attached as Exhibit G is a true and correct copy of a witness statement by Christopher Goodfellow dated February 10, 2019, in a parallel civil case in the United Kingdom against Dr. Lynch raising similar allegations.
12. The government understands Goodfellow is represented by Swanson & McNamara LLP. To date, counsel for Goodfellow has not agreed to accept service of a subpoena. The government understands he resides in the United Kingdom.
13. The government understands Blanchflower is represented by Swanson & McNamara LLP. To date, counsel for Blanchflower has not agreed to accept service of a subpoena. The government understands Blanchflower resides in or near Cambridge and would not contest being deposed in London.
14. Attached as Exhibit H is a true and correct copy of an FBI memorandum of interview of Ian Black dated January 25, 2019
15. The government understands Black is represented by Swanson & McNamara LLP. To date, Black's counsel has not agreed to accept service of a subpoena. The government understands Black resides in or near London and would not contest being deposed in London.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 29th day of September 2023 in the Northern District of California.

/s/ Robert S. Leach
 ROBERT S, LEACH
 Assistant United States Attorney